

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

*MARIANNA ZHAO, on behalf of herself, FLSA  
Collective Plaintiffs, and the Class,*

Plaintiff,

v.

SURGE PRIVATE EQUITY LLC,  
d/b/a SURGE PRIVATE EQUITY  
HIPPODROME SERVICES CORP.  
d/b/a HIPPODROME SERVICES  
HIPPODROME LLC,  
d/b/a HIPPODROME SERVICES LLC  
and DOUGLAS KOPELMAN ,

Case No.: 1:22-cv-07314

Defendants.

---

**DECLARATION OF C.K. LEE**

I, C.K. Lee, under penalty of perjury, affirm as follows:

1. My name is C.K. Lee, and I am a member of Lee Litigation Group, PLLC, Plaintiff's counsel in the above-captioned matter.

2. I submit this declaration in support of Plaintiffs' Motion for Conditional Collective Certification.

3. Attached hereto as **EXHIBIT A** to are true and correct copies of the Proposed Notice of Pendency of Lawsuit Regarding Wages and "Consent to Sue" Form.

I affirm, under penalty of perjury, that the above and foregoing information is true and correct.

Dated: New York, New York

January 6, 2023

Respectfully submitted,

By: /s/ C.K. Lee  
C.K. Lee, Esq. (CL 4086)  
Lee Litigation Group, PLLC  
148 West 24th Street, 8th Floor  
New York, NY 10011  
Tel: (212) 465-1188  
Fax: (212) 465-1181  
*Attorney for Plaintiff, FLSA Collective Plaintiffs, and the Class.*